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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
MISSOULA DIVISION

MOUNTAIN WEST FARM BUREAU  
MUTUAL INSURANCE COMPANY,

Plaintiff,

v.

JANNA PUMMILL and ADAM  
PUMMILL,

Defendants.

Cause No. CV 21-58-M-SEH

AFFIDAVIT OF RUBEN  
DOMINGUEZ

STATE OF MONTANA    )  
                                  : ss.  
County of Gallatin

RUBEN DOMINGUEZ, duly sworn upon his oath, deposes and states as  
follows:

1. I am employed as the Director of Litigation and Montana Claims for Mountain West Farm Bureau Mutual Insurance Company (“Mountain West”).

2. I was responsible for overseeing Adam Pummill’s and Janna Pummill’s claims in the underlying actions giving rise to this declaratory action and have reviewed all the bills submitted to Mountain West in connection with their defense.

3. Attached as Exhibit A are true and correct copies of bills submitted to and paid by Mountain West in connection with the defense of Adam Pummill in the underlying lawsuit against him. These bills were submitted by retained defense counsel, the Drake Law Firm P.C., and were represented to reflect the reasonable and necessary fees and expenses incurred to defend Adam Pummill in the underlying action against him.

4. The total amount of attorney fees and costs that Mountain West paid for the defense of Adam Pummill in the underlying lawsuit against him was \$119,813.50.

5. Attached as Exhibit B are true and correct copies of bills submitted to and paid by Mountain West in connection with the defense of Janna Pummill in the underlying lawsuit against her. These bills were submitted by retained defense counsel, the Drake Law Firm, P.C., and were represented to reflect the reasonable

and necessary fees and expenses incurred to defend Janna Pummill in the underlying action against her.

6. The total amount of attorney fees and costs that Mountain West paid for the defense of Janna Pummill in the underlying lawsuit against her was \$35,159.84.

7. The total amount of attorney fees and costs that Mountain West paid for the defense of Adam Pummill and Janna Pummill in the underlying lawsuits against them is \$154,973.34.

DATED this 20 day of December, 2022.

  
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SUBSCRIBED AND SWORN TO before me this 20 day of December, 2022, by Ruben Dominguez.

  
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Notary Public for the State of Montana

